

KASEY D. ALVES

PLAINTIFF

VERSUS

CAUSE NO. 1:06cv912 LG-JMR

HARRISON COUNTY MISSISSIPPI, BY AND  
THROUGH THE BOARD OF SUPERVISORS;  
HARRISON COUNTY SHERIFF'S DEPARTMENT;  
SHERIFF GEORGE PAYNE, JR.; AND  
HEALTH ASSURANCE, LLC

DEFENDANTS

**DEPOSITION OF GAYE HARTLEY**

Taken at the office of Woodrow Pringle,  
2217 Pass Road, Gulfport, Mississippi,  
beginning on Tuesday, January 15, 2008  
at 10:30 a.m.

**REPORTED BY:**

CRYSTAL LYNN MORRIS, CSR #1704  
BAILEY, KEENLANCE & ASSOCIATES  
Post Office Box 1707  
Gulfport, Mississippi 39502  
Telephone: (228) 868-8833  
Fax: (228) 868-8866

**ORIGINAL**

1 happened. The young man had a seizure on the unit  
2 or in the block and we went down there and he was in  
3 full-blown seizure and then he proceeded to go into  
4 cardiac arrest and I initiated CPR.

5 Q. Okay.

6 A. And to no avail.

7 Q. Do you know if Mr. Smith was involved  
8 in an altercation with any of the jailers?

9 A. Not at the time. There has been  
10 speculation and accusations that he had been. I have  
11 not been notified of any depositions or lawsuits  
12 pending.

13 Q. All right. Deputy you observe any  
14 physical injuries to Mr. Smith?

15 A. No, sir.

16 Q. During the year and a half that you  
17 worked at the Harrison County Jail did you ever  
18 observe any instances where you felt an inmate had  
19 been abused by a jailer?

20 MR. MCRANEY: Object to form.

21 THE WITNESS: Pardon. I was listening to him  
22 and you.

23 BY MR. PRINGLE, III:

24 Q. That's okay. During the year  
25 and-a-half that you worked at the Harrison County Jail

1 did you observe instances where you felt an inmate had  
2 been abused by an officer?

3 MR. MCRANEY: Same objection. She can  
4 answer.

5 THE WITNESS: Yes.

6 BY MR. PRINGLE, III:

7 Q. Okay. Do you know was it one  
8 occasion, many occasions, or how many?

9 MR. MCRANEY: Object to the form.

10 MR. PRINGLE, III: Go ahead.

11 THE WITNESS: Several.

12 BY MR. PRINGLE, III:

13 Q. All right. On the instances where  
14 you did observe this conduct did you report it?

15 A. I may have mentioned it to one of the  
16 sergeants.

17 Q. Do you remember who the sergeant was?

18 A. It may have been Sergeant Foster.

19 Q. Okay. All right. Did you make any  
20 type of written complaint?

21 A. No, sir, not that I recall.

22 Q. All right. Did you make any record  
23 of what you observed in any of your records?

24 A. It would have been documented, the  
25 injuries that were -- of any injuries on the inmates.

Q. Okay. But you had concerns about some of the inmates and the injuries they received?

MR. MCRANEY: Object to the form but you can answer.

THE WITNESS: Yes, sir.

BY MR. PRINGLE, III:

Q. Okay. All right. So you would treat the inmate and note the injuries in the chart; is that correct?

A. Yes, sir.

Q. Would you also note what the inmate had told you had happened?

A. Yes, sir.

Q. And that would be in the medical chart?

A. Yes, sir.

Q. Okay. All right. And this occurred on several occasions?

A. Yes, sir.

Q. All right. And were you asked about this by the Department of Justice also?

A. No, sir.

Q. The only case they questioned you about was the Smith case?

A. Yes, sir.